

EXHIBIT 15

DR. NORMAN J. NOVICK

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x

IN RE: METHYL TERTIARY BUTYL
ETHER ("MTBE") PRODUCTS
LIABILITY LITIGATION

-----x

This document relates to: All Cases

-----x

February 22, 2007
9:58 a.m.

Deposition of DR. NORMAN J. NOVICK,
taken by Plaintiffs, pursuant to notice, at the
offices of Weitz & Luxenberg, P.C., 180 Maiden
Lane, New York, New York, before Douglas Winter,
a Shorthand Reporter and Notary Public.

DR. NORMAN J. NOVICK

Page 142

1 Q Fair enough.

2 Did Mobil conduct a conference
3 specific to MTBE in 1998?

4 A In --

5 MR. MCGILL: Objection to the
6 form.

7 A In 1998 -- I am sorry.

8 THE WITNESS: Repeat the question.

9 Q Did Mobil Corporation conduct a or
10 hold a, I am not sure, a conference that focused
11 on MTBE in 1998?

12 A There may have been a meeting
13 for -- of remediation folks, and MTBE issues may
14 have been discussed. Whether it was a meeting
15 specific for MTBE, I don't recall. But,
16 certainly, there could have been a meeting of
17 Global Remediation that -- in which information
18 on MTBE was presented.

19 MR. WALSH: Mark as Exhibit O, a
20 document that has Bates Nos. M0010729
21 through 0010735.

22 (Document bearing Bates Nos.
23 M0010729 through 0735 marked Novick
24 Exhibit O for identification.)

25 (Witness reviews document)

DR. NORMAN J. NOVICK

Page 143

1 A Okay.

2 Q Dr. Novick, do you recall giving
3 this presentation that's reflected in Exhibit O?

4 A I don't recall giving it, but it's
5 obviously my presentation.

6 Q Do you recall the conference --

7 A It says "Mobil Continuous
8 Improvement Conference." I only can assume that
9 this was, again, Global Remediation folks would
10 get together and discuss -- you know, it would
11 be a meeting, and different subjects would be
12 presented. This must have been one of the
13 subjects that was presented. I am assuming
14 that.

15 Q Having looked at pretty much all
16 the PowerPoints from that date, although I will
17 represent to you a fair amount of the discussion
18 was on MTBE, you do not recall a continuous
19 improvement conference that had MTBE as the
20 focus --

21 MR. MCGILL: Objection to the
22 form.

23 Q -- in March of '98?

24 MR. MCGILL: Objection.

25 A I am not sure. Just because you